

TIMOTHY COURCHAINED
United States Attorney
District of Arizona

KEVIN M. RAPP
Arizona State Bar No. 014249
Assistant United States Attorneys
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, Arizona 85004
Telephone: 602-514-7500
Email: Kevin.Rapp@usdoj.gov
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Adam Weinstein,
Gerald Dixon,

Defendants.

CR- 25-00541-PHX-SMB(DMF)

**UNITED STATES' NOTICE OF EXPERT
WITNESS**

Pursuant to the Federal Rules of Criminal Procedure, Rule 16(a)(1)(G), the United States, by and through undersigned counsel, gives notice of its intent to use an expert witness testimony under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial. Although the below expert does not intend to provide an opinion the United States' is noticing him as an expert in an abundance of caution.

I.

**Dominick Margarella, CPA, CFE, Forensic Accountant, FBI Phoenix
Division**

Mr. Margarella is an accounting expert and may testify to various accounting summaries and other examinations of the accounting and bank records attributable to the defendants and their various entities. He has summarized how the accounting and bank records dealt with the flow of funds to and from the victim and the defendants. The

summary chart(s) will set forth the flow of funds from the victim's bank account and how those funds were moved through the defendants' entities and bank accounts. Mr. Margarella's testimony will include the process of which he received the financial information, how he analyzed it, and how the funds flowed through to the defendants' accounts. These summary analyses shall be provided to defense counsel through discovery and separate communications. Mr. Margarella's resume is attached as Exhibit A.

Lastly, Mr. Margarella has testified as either a non-expert summary witness or in an expert capacity in the following cases:

- *United States v. Paxton Jeffrey Anderson*, et al., CR-12-01606-PHX-SRB
- *United States v. Willie Gene Woodard*, CR-10-01721-PHX-DLR
- *United States v. Elseddig Elmarioud Musa*, CR-15-01265-DLR

Expert Witness Signature

Pursuant to Rule 16(a)(1)(G)(v) and Section II.C.3 of the Electronic Case Filing Administrative Policies and Procedure Manual, the expert witness identified to date have approved and signed this notice and/or their reports, and/or will approve and sign any supplemental notices and/or reports in advance of trial, pursuant to Rule 16(a)(1)(G)(iii). The United States reserves the right to supplement this notice with additional areas of testimony and/or other experts, if necessary.


 Dominick Margarella, CPA, CFE

Respectfully submitted this th day of April, 2024.

TIMOTHY COURCHAIINE
 United States Attorney
 District of Arizona

s/ Kevin M. Rapp
 KEVIN M. RAPP
 Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2025, I electronically transmitted the attached Notice of Expert Witness to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

s/D. Parke
U.S. Attorney's Office